1 2 3 4 5 6 7 8 9	THOMAS E. FRANKOVICH (State Bar No. 074414) JULIA M. ADAMS (State Bar No. 230795) THOMAS E. FRANKOVICH, A Professional Law Corporation 2806 Van Ness Avenue San Francisco, CA 94109 Telephone: 415/674-8600 Facsimile: 415/674-9900  Attorneys for Plaintiffs MARSHALL LOSKOT and DISABILITY RIGHTS ENFORCEMENT, EDUCATION SERVICES: HELPING YOU HELP OTHERS
11	UNITED STATES DISTRICT COURT
12	NORTHERN DISTRICT OF CALIFORNIA
<ul><li>13</li><li>14</li><li>15</li></ul>	MARSHALL LOSKOT, an individual; and DISABILITY RIGHTS ENFORCEMENT, DEDUCATION SERVICES:HELPING YOU HELP OTHERS, a California public benefit corporation, AND DISCOVERY DEADLINES
16	Plaintiffs,
17	v. )
18 19	DOLLAR INN PETALUMA; CODDING ) MOTEL PARTNERS; and JAY DESAI, an ) individual dba DOLLAR INN,
20	Defendants.
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23	Plaintiffs MARSHALL LOSKOT and DISABILITY RIGHTS ENFORCEMENT,
24	EDUCATION SERVICES, by and through their counsel and defendants DOLLAR INN
25	PETALUMA; CODDING MOTEL PARTNERS; and JAY DESAI, an individual dba DOLLAR
26	INN, by and through their counsel, stipulate, and respectfully request, as follows:
27	1. The current deadline by which a mediation was to have been conducted in this
28	matter was July 5, 2005. A mediation was previously scheduled for July 1, 2005. However,
	STIPULATION AND [PROPOSED] ORDER CONTINUING  THE MEDIATION AND DISCOVERY DEADLINE  CASE NO. CV04-2845 TEH

because plaintiff Loskot was undergoing daily treatments at his physicians office at that time, the 1 mediation was rescheduled. 3 The parties have since rescheduled the mediation to September 23, 2005, the first 4 day available for all parties and the assigned mediator. 5 3. As the new mediation date is past the mediation deadline, the parties respectfully request that the mediation deadline be continued up to and including September 30, 2005. 6 7 4. Further, as the parties would like to avoid incurring the costs related to propounding and responding to discovery before the scheduled mediation is to take 8 9 place, the parties respectfully request that the discovery deadline be continued up to and including October 31, 2005. 10 11 Dated: August 17, 2005 THOMAS E. FRANKOVICH, APLC 12 By: 13 Julia M. Adams Attorneys for Plaintiffs MARSHALL LOSKOT, an individual; and DISABILITY RIGHTS 14 ENFORCÉMENT, EDUCATION SERVICES: 15 HELPING YOU HELP OTHERS, a California public benefit corporation 16 Dated: August 22, 2005 **DeVRIES LAW GROUP** 17 18 By: \_\_ Daniel J. DeVries 19 Attorneys for Defendants SAKHI CORPORATION, a California Corporation, dba 20 DOLLAR INN PETALUMA, and CODDING **MOTEL PARTNERS** 21 22 23 **ORDER** 24 IT IS SO ORDERED. IT IS SO ORDERED 25 26 Judge Thelton E. Henderson 27 Dated: August 23, 2005 Hon. T 28 UNITE STIPULATION AND [PROPOSED] ORDER CONTINUING THE MEDIATION AND DISCOVERY DEADLINE -2-